

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PEARSON EDUCATION, INC., :
JOHN WILEY & SONS, INC., :
CENGAGE LEARNING, INC. AND :
THE MCGRAW-HILL COMPANIES, INC., :
Plaintiffs, :

-against-

11 Civ. 5052 (PAE)

LAZAR ISHAYEV AND YELENA LEYKINA :
BOTH D/B/A SOLUTIONS DIRECT D/B/A :
SOLUTIONS4LESS D/B/A :
TEXTBOOKANSWERS D/B/A :
SOLUTIONMANUALS-TESTBANKS.COM AND :
JOHN DOE NOS. 1-5, :
Defendants. :

ECF Case

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NOTICE OF MOTION OF PLAINTIFFS
FOR PARTIAL SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the annexed
declarations of Laura Scileppi, sworn to December 17, 2012,
LaShonda Morris, sworn to December 7, 2012, Patrick Murphy,
sworn to December 10, 2012, Jessica Stitt, sworn to December
10, 2012, Bonnie Beacher, sworn to December 14, 2012 and
Jennifer Siewert, sworn to December 17, 2012, the notice to
pro se litigants, the accompanying statement pursuant to Rule
56.1 of the Civil Rules of this Court and all prior
proceedings in this action, plaintiffs Pearson Education,
Inc. ("Pearson"), John Wiley & Sons, Inc. ("Wiley"), Cengage

Learning Inc. ("Cengage") and The McGraw-Hill Companies, Inc. ("McGraw-Hill") will move this Court before the Hon. Paul A. Englemayer, United States District Judge, in Courtroom 18C of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, at 10 a.m. on January 29, 2013, or as soon thereafter as counsel may be heard, for an order:

(a) Pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting plaintiffs summary judgment on their ownership of 59 valid copyrights in the works annexed hereto on Schedules A through D;

(b) Pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting plaintiffs summary judgment on the infringement of 1 copyright of Pearson, 2 copyrights of Wiley, 1 copyright of Cengage and 2 copyrights of McGraw-Hill;

(c) Pursuant to Rule 65 of the Federal Rules of Civil Procedure, permanently enjoining defendants Lazar Ishayev and Yelena Leykina from further infringing six of the plaintiffs' copyrights;

(d) Pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting plaintiffs summary judgment on defendant Lazar Ishayev's counterclaim;

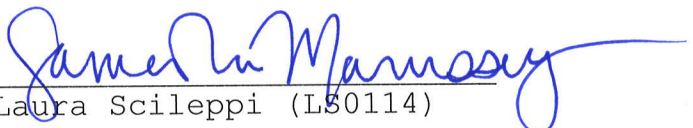
(e) Pursuant to Rule 56 of the Federal Rules of Civil Procedure, denying defendant Lazar Ishayev's motion for summary judgment; and

(f) Granting such other and further relief as to the Court may seem just and proper.

In accordance with the Individual Rules of this Court for civil pro se cases, opposition papers are due on January 14, 2013.

Dated: New York, New York
December 17, 2012

DUNNEGAN & SCILEPPI LLC

By 
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Schedule A
 "Pearson Copyrights"

Title, Author (Edition) (Registration Date) (Registration Number)

1. Accounting Information Systems, Romney (11th Edition)
 (March 24, 2008) (TX0006996489)
2. Accounting Information Systems, Bodnar (10th Edition)
 (October 27, 2009) (TX0007073739)
3. Advanced Accounting, Beams (10th Edition) (October 22,
 2008) (TX0006899994)
4. A First Course in Probability, Ross (7th Edition)
 (January 17, 2006) (TX0006304470)
5. Auditing and Assurance Services: An Integrated
 Approach, Arens (12th Edition) (April 13, 2007)
 (TX0006548957)
6. Auditing and Assurance Services: An Integrated
 Approach, Arens (13th Edition) (April 2, 2009)
 (TX0006968258)
7. College Accounting: A Practical Approach, Slater (11th
 Edition) (November 3, 2009) (TX0007074689)
8. Corporate Finance, Berk (2nd Edition) (March 16, 2010)
 (TX0007147969)
9. Cost Accounting: A Managerial Emphasis, Horngren (13th
 Edition) (May 1, 2008) (TX0007005297)
10. Digital Signal Processing, Proakis (4th Edition) (May
 23, 2006) (TX0006347802)
11. Economic Growth, Weil (2nd Edition) (June 13, 2009)
 (TX0006978967)
12. Financial Accounting, Waybright (1st Edition) (March 1,
 2010) (TX0007147630)
13. Financial Accounting: A Business Process Approach,
 Reimers (3rd Edition) (May 7, 2010) (TX0007177669)
14. Foundations of Finance, Keown (6th Edition) (August 9,
 2007) (TX0006904586)
15. Foundations of Finance, Keown (7th Edition) (March 11,
 2010) (TX0007152724)
16. Fundamentals of Corporate Finance, Berk (1st Edition)
 (April 29, 2009) (TX0006962665)
17. Fundamentals of Derivatives Markets, McDonald (1st
 Edition) (May 7, 2008) (TX0007019569)
18. Fundamentals of Futures and Options Markets, Hull (7th
 Edition) (May 23, 2010) (TX0007161496)
19. Governmental and Nonprofit Accounting Theory and
 Practice, Freeman (9th Edition) (September 28, 2010)
 (TX0007267656)

20. International Accounting, Choi (7th Edition) (October 18, 2010) (TX0007278185)
21. Introduction to Financial Accounting, Horngren (10th Edition) (October 18, 2010) (TX0007284585)
22. Introduction to Governmental and Not-for-Profit Accounting, Razeq (6th Edition) (April 11, 2008) (TX0006975056)
23. Introduction to Management Accounting, Horngren (15th Edition) (May 24, 2010) (TX0007188121)
24. Introduction to Management Science, Taylor (10th Edition) (April 22, 2009) (TX0006969077)
25. Quantitative Analysis for Management Render (10th Edition) (April 10, 2008) (TX0006936506)

Schedule B
 "Wiley Copyrights"

Title, Author (Edition) (Registration Date) (Registration Number)

1. Accounting Information Systems Controls and Processes, Leslie Turner (1st Edition) (May 11, 2009) (TX0006997785)
2. Accounting Principles, Jerry Weygandt (8th Edition) (December 20, 2007) (TX0006954905)
3. Accounting Principles, Jerry Weygandt (9th Edition) (April 16, 2010) (TX0007192054)
4. Advanced Accounting, Debra Jeter (3rd Edition) (July 7, 2008) (TX009942175)
5. Advanced Accounting, Debra Jeter (4th Edition) (March 25, 2011) (TX0007348265)
6. Auditing and Assurance Services: Understanding The Integrated Audit, Karen Hooks (1st Edition) (November 19, 2010) (TX0007311465)
7. Business Statistics: For Contemporary Decision Making, Ken Black (5th Edition) (October 3, 2007) (TX0006860598)
8. Business Statistics: For Contemporary Decision Making, Ken Black (6th Edition) (January 7, 2011) (TX0007309917)
9. Financial Accounting, Jerry Weygandt (7th Edition) (November 24, 2010) (TX0007303554)
10. Financial Accounting: IFRS Edition, Jerry Weygandt (1st Edition) (February 22, 2011) (TX0007328417)
11. Financial Accounting in an Economic Context, Jamie Pratt (7th Edition) (April 26, 2010) (TX0007173453)
12. Financial Accounting: Tools for Business Decision Making, Paul Kimmel (5th Edition) (April 15, 2010) (TX0007166080)
13. Government and Not-For-Profit Accounting Concepts and Practices, Michael Granof (5th Edition) (November 19, 2010) (TX0007311743)
14. Intermediate Accounting, Donald Keiso (13th Edition) (September 10, 2009) (TX0007044357)
15. Intermediate Accounting: IFRS, Donald Keiso (1st Edition) (February 22, 2011) (TX0007328995)
16. Managerial Accounting, James Jiambalvo (4th Edition) (May 4, 2010) (TX0007212095)
17. Managerial Accounting Tools For Business Decision Making, Jerry Weygandt (5th Edition) (November 19, 2010) (TX0007311538)

18. Operations Management, Dan Reid (4th Edition) (June 1, 2010) (TX0007204115)
19. Operations Management: Along The Supply Chain, Roberta Russell (6th Edition) (March 15, 2010) (TX0007158023)

Schedule C
"Cengage Copyrights"

Title, Author (Edition) (Registration Date) (Registration Number)

1. Financial Management: Theory and Practice,
Brigham/Ehrhardt (12th Edition) (May 9, 2007)
(TX0006560448)
2. Accounting, Warren/Reeve/Fess (20th Edition) (April 2,
2001) (TX0005349208)
3. Auditing: A Business Risk Approach,
Rittenberg/Johnstone/Gramling (6th Edition) (May 29,
2007) (TX0006583787)
4. Business Communication, Lehman/Dufrene (15th Edition)
(April 20, 2007) (TX0006567554)
5. Business Law, Text and Cases,
Clarkson/Jentz/Cross/Miller (11th Edition) (May 12,
2008) (TX0006863239)
6. Contemporary Auditing, Knapp (7th Edition) (September
8, 2008) (TX0006880551)
7. Concepts in Federal Taxation 2009, Murphy/Higgins (16th
Edition) (May 12, 2008) (TX0006855490)
8. Cost Management: Accounting and Control,
Hansen/Mowen/Guan (6th Edition) (January 16, 2008)
(TX0006841472)
9. Financial Accounting: An Introduction to Concepts,
Methods and Uses, Stickney/Weil/Schipper/Francis) (13th
Edition) (September 18, 2009) (TX0007033436)
10. Financial and Managerial Accounting, Needles (8th
Edition) (April 16, 2007) (TX0006577019)

Schedule D
"McGraw-Hill Copyrights"

Title, Author (Edition) (Registration Date) (Registration Number)

1. Principles of Auditing and Other Assurance Services,
Whittington (17th Edition) (September 28, 2009)
(TX0007226971)
2. Principles of Corporate Finance Solutions Manual,
Brealey (7th Edition) (March 11, 2003) (TX0005698593)
3. Advanced Financial Accounting, Baker (8th Edition)
(June 18, 2009) (TX0006994271)
4. Corporate Finance, Ross (9th Edition) (September 28,
2010) (TX0007265582)
5. Advanced Accounting Solutions Manual,
Hoyle/Schaefer/Doupnik (9th Edition) (May 27, 2009)
(TX0006976421)